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**Objection Deadline:**  
September 11, 2019 at 11:00 a.m.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

JEFFREY LEW LIDDLE,

Case No. 19-10747-shl

Debtor.

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**OBJECTION BY COUNSEL FINANCIAL II LLC TO DEBTOR'S  
PROPOSED ORDER DENYING COUNSEL FINANCIAL II LLC'S CLAIM  
OF A PERFECTED SECURITY INTEREST IN AND LIEN ON CERTAIN  
CASH COLLATERAL AND GRANTING RELATED RELIEF [DOC 171]**

TO THE HONORABLE SEAN H. LANE,  
UNITED STATES BANKRUPTCY JUDGE:

Counsel Financial II LLC ("CF2"), by its attorneys, Davidoff Hutcher & Citron LLP, submits the following objection to the Debtor's proposed order denying Counsel Financial II LLC's claim of a perfected security interest in and lien on certain cash collateral and granting related relief [Doc 171] and represents and states:

1. CF2 objects to paragraphs 3, 4, and 6 of the proposed order as inappropriate for inclusion in such order, especially paragraph 4.

2. Counsel for CF2 will discuss paragraphs 3 and 6 with counsel for the Debtor, in an effort to resolve the issues raised, and counsel for CF2 will discuss the issue raised by paragraph 4 with counsel for Tara Liddle. However, these matters should all be treated in separate orders.

Dated: New York, New York  
September 11, 2019

DAVIDOFF HUTCHER & CITRON LLP

By: /s/ David H. Wander

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